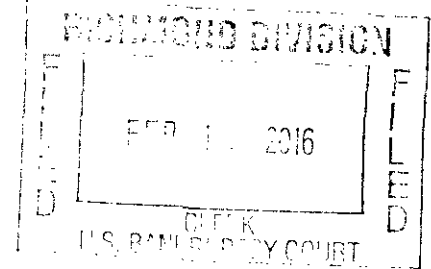


UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

CASE NO: 15-36520-KLP
CHAPTER 13

In re
David G. Lambert
Brenda L. Lambert

Debtor(s),



ANDREW J. HOLICK
AMENDED NOTICE OF OBJECTION TO CONFIRMATION

COMES NOW the creditor, Andrew J. Holick, and hereby serves its notice of objection to confirmation of the Debtor(s) proposed Chapter 13 Plan.

This Creditor objects to confirmation based upon the following:

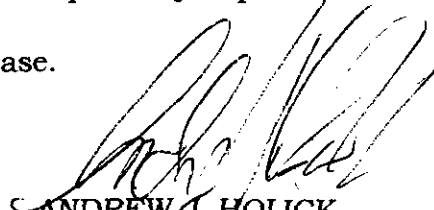
The Debtor(s) are habitual filers. The Debtor(s) filed Chapter 7 on May 20, 2005 Case # 05-34697-DOT, which was discharged on September 2, 2005.

The Debtor(s) filed a Chapter 13 on September 7, 2010, Case # 10-35840-KLP. The Plan was set up initially with payment for funding of \$545.00 for (60) sixty months. The Debtor(s) were not funding the Plan. Just (16) sixteen months after the initial filing, on January 10, 2012, the Debtor(s) had to modify the Plan and reduce the monthly payments to \$396.80 for (15) fifteen months, \$300.00 for (4) four months, \$660.00 for (41) forty-one months. Again, the Debtor(s) failed to fund the Plan. The Plan was amended a second time on March 7, 2013. The Debtor(s) proposed to fund the Plan by making payments of \$451.21 for 32 months, \$785.00 for 25 months. Sixteen months later, the Debtor(s) requested the case be dismissed on July 7, 2014, without fully funding the Plan.

The Debtor(s) then filed a Chapter 7 on July 9, 2014, Case # 14-33685-KRH, which was discharged on October 22, 2014.

The Debtor(s) come now and file a Chapter 13 on December 23, 2015 which is deemed ineligible for discharge under USC 727 (a)(8)(9) or 1328(f). The Debtor(s) are now proposing a funding Plan where they will pay \$500.00 for the first (6) six months and then \$990.00 for (54) fifty-four months. The Debtor(s) past history has demonstrated that they are unable to fulfill this Plan.

WHEREFORE, this Creditor respectfully requests this honorable Court to deny Confirmation and dismiss this case.

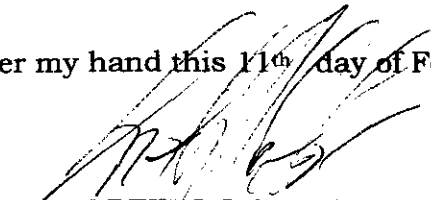


ANDREW J. HOLICK

CERTIFICATE OF SERVICE

I CERTIFY that a copy has been furnished either by electronic or standard first class mail on February 11, 2016, to: David G. Lambert and Brenda L. Lambert, Debtor(s), 6425 Meadowburn Drive, Chesterfield, VA 23234; Pia J. North, North Law, Debtor(s) Attorney, 5913 Harbour Park Drive, Midlothian, VA 23112 Fax: (804) 739-2550; Suzanne E. Wade, Chapter 13 Trustee, PO Box 1780, Richmond, VA 23218-1780 Fax: (804) 775-0986.

Given under my hand this 11th day of February, 2016



ANDREW J. HOLICK